IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	: CRIMINAL NO.	
v.	: DATE FILED:	
ROBERT DARIGO	: VIOLATIONS:	18 U.S.C. § 1341
a/k/a Robert Rosetti		(Mail Fraud-10 Counts)
a/k/a Bobby Rosetti	:	
a/k/a Michael Morrer		
a/k/a James Schwar	:	
a/k/a Robert Miller		
a/k/a Robert Rossi	•	

<u>INDICTMENT</u>

COUNTS ONE THROUGH TEN

THE GRAND JURY CHARGES THAT:

At all times material to the Indictment:

- 1. Defendant ROBERT DARIGO operated purported credit repair businesses known as "First International Credit" located at 3 Neshaminy Interplex, Suite 301, Trevose, Pennsylvania (PA) 19053, "Freedom Benefits" located at 740 Red Lion Road, Suite 179, Philadelphia, PA 19115 and "National Credit One" located at 740 Red Lion Road, Suite 160, Philadelphia, PA 19115.
- PostNet was a business service center located at 740 Red Lion Road,
 Philadelphia, PA, which provided mail receiving and check-cashing services to clients.

- 3. Richmond Financial Inc. was a currency exchange located at 2990 Richmond Street, Philadelphia, PA, which provided check-cashing services to clients.
- 4. The Office Works was a business service center located at 3 Neshaminy Interplex, Trevose, PA, which provided telephone answering and mail receiving services to clients.

THE SCHEME

5. From on or about January 1, 2002, through on or about September 9, 2002, in Trevose and Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania and elsewhere, defendant

ROBERT DARIGO, a/k/a Robert Rosetti, a/k/a Bobby Rosetti, a/k/a Michael Morrer, a/k/a James Schwar, a/k/a Robert Miller, a/k/a Robert Rossi,

and others known and unknown to the grand jury, devised and intended to devise a scheme to defraud consumers from across the country, and to obtain money and property from these consumers by means of false and fraudulent pretenses, representations and promises.

It was part of the scheme that:

- 6. Defendant ROBERT DARIGO identified consumers who had poor credit ratings.
 - 7. Defendant ROBERT DARIGO contacted, and caused to be contacted,

consumers by telephone, falsely representing that he could help re-establish their credit rating through issuance of an unsecured VISA or MasterCard.

- 8. Defendant ROBERT DARIGO falsely represented and caused to be represented to consumers that payment of a processing fee of between \$199 and \$209 would insure issuance of an unsecured VISA or MasterCard to the consumer.
- 9. Defendant ROBERT DARIGO specified and caused to be specified to victim/consumers that the processing fee of between \$199 and \$209 should be sent by overnight delivery services including U.S. Postal Service Express Mail, Federal Express, and United Parcel Service, to either 3 Neshaminy Interplex, Suite 301, Trevose, PA 19053; 740 Red Lion Road, Suite 179, Philadelphia, PA 19115; or 740 Red Lion Road, Suite 160, Philadelphia, PA 19115.
- 10. After receiving checks and money orders sent by victim/consumers, defendant ROBERT DARIGO negotiated the checks and money orders through Richmond Financial Inc., 2990 Richmond Street, Philadelphia, PA.
- 11. Defendant ROBERT DARIGO failed to deliver or issue any credit cards to the consumers despite receipt and acceptance of the solicited fee.
- 12. Defendant ROBERT DARIGO concealed his true identity by using the fictitious names Robert Rosetti, Bobby Rosetti, Michael Morrer, James Schwar, Robert Miller and Robert Rossi in identifying himself to representatives of the Bensalem Township Police Department, the Office Works, PostNet, Printmasters, the Buck Village Office Complex and the Neshaminy Plaza Office Complex.

13. Defendant ROBERT DARIGO defrauded at least 143 consumers who paid solicited fees of at least \$28,600.

THE MAILINGS

On or about the dates listed below, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, having devised and intending to devise the scheme, defendant

> ROBERT DARIGO, a/k/a Robert Rosetti, a/k/a Bobby Rosetti a/k/a Michael Morrer, a/k/a James Schwar, a/k/a Robert Miller, a/k/a Robert Rossi,

for the purpose of executing the scheme and attempting to do so, knowingly caused to be delivered by and received from the United States Postal Service and from private and commercial interstate carriers, checks or money orders as described below for each count:

COUNT	DATE	SENDER	ADDRESSEE	ITEM DELIVERED	CARRIER
1	03/01/02	М.Н.	National Credit One 740 Red Lion Road Suite 160 Philadelphia, PA 19115	Money order payable to National Credit One in the amount of \$199.00	U.S. Mail
2	03/05/02	G.L.	Freedom Benefits 740 Red Lion Road Suite 179 Philadelphia, PA 19115	Money order payable to Freedom Benefits in the amount of \$199.00	U.S. Mail
3	03/09/02	A.M.	National Credit One 740 Red Lion Road Suite 160 Philadelphia, PA 19115	Money order payable to National Credit One in the amount of \$199.00	U.S. Mail

4	04/06/02	A.H.	Freedom Benefits 740 Red Lion Road Suite 179 Philadelphia, PA 19115	Money order payable to Freedom Benefits in the amount of \$200.00	U.S. Mail
5	05/31/02	D.T.	First International Credit 3 Neshaminy Interplex Suite 301 Trevose, PA 19053	Money order payable to First International Credit in the amount of \$209.00	U.S. Mail
6	06/01/02	D.L.	First International Credit 3 Neshaminy Interplex Suite 301 Trevose, PA 19053	Money order payable to First International Credit in the amount of \$209.00	U.S. Mail
7	06/26/02	R.M.	First International Credit 3 Neshaminy Interplex Suite 301 Trevose, PA 19053	Cashier's check payable to First International Credit in the amount of \$209.00	FedEx
8	07/12/02	C.R.	First International Credit 3 Neshaminy Interplex Suite 301 Trevose, PA 19053	Money order payable to First International Credit in the amount of \$209.00	U.S. Mail
9	07/25/02	C.K	First International Credit 3 Neshaminy Interplex Suite 301 Trevose, PA 19053	Personal check payable to First International Credit in the amount of \$209.00	U.S. Mail
10	07/29/02	P.N.	First International Credit 3 Neshaminy Interplex Suite 301 Trevose, PA 19053	Money order payable to First International Credit in the amount of \$209.00	U.S. Mail

All in violation of Title 18, United States Code, Section 1341.

	A TRUE BILL:
	FOREPERSON
PATRICK L. MEEHAN	

United States Attorney